

TASHA PARIS CHALFANT (SBN 207055)  
THE LAW OFFICE OF TASHA PARIS CHALFANT  
13620 Lincoln Way, Suite 325  
Auburn, California 95603  
Tel. (916) 444-6100  
Fax (916) 930-6093  
E-mail: tashachalfant@gmail.com

Attorney for Defendant  
JOSHUA IVARSON

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA IVARSON,

Defendant.

No. 2:24-cr-0301 DJC

STIPULATION REGARDING  
EXCLUDABLE TIME PERIODS UNDER  
SPEEDY TRIAL ACT; FINDINGS AND  
ORDER

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney JASON HITT, and the Defendant, JOSHUA IVARSON, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for a status conference before Judge Daniel J. Calabretta on May 15, 2025, with time excluded to that date.

2. By this stipulation, the defendant now moves to reset the status conference on May 15, 2025, and to exclude time between May 15, 2025, and July 31, 2025, under Local Code T4.

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

1 Plaintiff does not oppose this request.

2 3. The parties agree and stipulate, and request that the Court find the following:

3 a. The government has represented that the discovery associated with this case  
4 includes approximately 500 plus pages of investigative reports in electronic form, and some audio  
5 and video files. All of this discovery has been either produced directly to counsel, and/or made  
6 available for inspection and copying.

7  
8 b. Counsel for the defendant desires additional time to review the discovery, develop  
9 the case, conduct investigation, consult with her client and relevant experts, discuss potential  
10 resolution, and to explain the consequences and guidelines. Many archived records have been  
11 identified which require lengthy efforts to obtain and then time is needed to discuss with the  
12 defendant and various experts.

13  
14 c. Counsel for the defendant believes that failure to grant the above-requested  
15 continuance would deny her the reasonable time necessary for effective preparation, taking into  
16 account the exercise of due diligence.

17  
18 d. The government does not object to the continuance.

19 e. Based on the above-stated findings, the ends of justice served by continuing the  
20 case as requested outweigh the interest of the public and the defendant in a trial within the original  
21 date prescribed by the Speedy Trial Act.

22 f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
23 et seq., within which trial must commence, the time period of May 15, 2025, to July 31, 2025,  
24 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
25 because it results from a continuance granted by the Court at defendant's request on the basis of  
26

27  
28 STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

1 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
2 of the public and the defendant in a speedy trial.

3 5. Nothing in this stipulation and order shall preclude a finding that other  
4 provisions of the Speedy Trial Act dictate that additional time periods are excludable from the  
5 period within which a trial must commence.  
6

7 All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on  
8 their behalf.

9 IT IS SO STIPULATED.

10 Dated: May 7, 2025

by: /s/Tasha Chalfant for  
JASON HITT  
Assistant U.S. Attorney  
Attorney for Plaintiff

13 Dated: May 7, 2025

by: /s/Tasha Chalfant  
TASHA CHALFANT  
Attorney for Defendant  
JOSHUA IVARSON

28 STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME

**ORDER**

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, May 15, 2025, to and including July 31, 2025, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the vacated status conference shall be reset on July 31, 2025, at 9:00 a.m.

IT IS SO FOUND AND ORDERED this 7<sup>th</sup> day of May, 2025.

Dated: May 7, 2025

/s/ Daniel J. Calabretta

---

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME